

REPORTER'S RECORD

VOLUME 3 OF 3 VOLUMES

COURT OF APPEALS NO 14-22-00694-CV

TRIAL COURT CAUSE NO 22-CCV-070378

RICHARD P. JONES &) IN THE COUNTY COURT
MICHAEL JOSEPH BITGOOD)
AKA MICHAEL EASTON)

Plaintiff,)

VS) OF LAW NUMBER THREE (3)

MARIANNA SULLIVAN,)
IMPERIAL LOFTS LLC,)
AND KARINA MARTINEZ)

Defendant(s).) FORT BEND COUNTY, TEXAS

MOTIONS HEARING

On the 13th day of September, 2022, the foregoing
proceedings came on to be heard outside the presence of a
Jury, in the above-entitled and enumerated cause; and the
following proceedings were held before the Honorable Lewis
White, Presiding Associate Judge of County Court #3, Fort
Bend County, Texas: Proceedings reported by Oral
Stenography; Reporter's Record produced BY COMPUTER-ASSISTED
TRANSCRIPTION.

ASHLEY AVILA, CSR #11807
COUNTY COURT AT LAW NO. 3
FORT BEND COUNTY

A P P E A R A N C E S

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I N D E X		
VOLUME 3 OF 3 VOLUMES		
MOTIONS HEARING		
	Page	Vol.
SEPTEMBER 13, 2022		
Announcements.	4	2
Case Called.	6	2
Opening Announcements	12	2
Case resumed.	25	2
Judicial Notice	26	2
Offering evidence.	37	2
Court's Findings	39	2
Reporter's Certificate	46	2

1 SEPTEMBER 13, 2022

2 P R O C E E D I N G S

3
4 THE COURT: Let's go on the record. Okay,
5 before we get started what we are going to do is we are
6 going to start off with the Rule 12, okay. And then, we are
7 going to do the Motion to Compel SLAPP, okay. And then, we
8 are going to discuss the Discovery Issue. And then, at the
9 end, the Docket Control Order. Is everybody on the same
10 page?

11 MR. OUBRE: Yes, Your Honor.

12 THE COURT: Okay. And this all determines if
13 we get there but we got to go in order, okay. That is the
14 order that we are going to go in and I understand you all
15 have -- you also have an agreement for the jury trial date
16 if we need one.

17 MR. BITGOOD: No, Your Honor.

18 THE COURT: No, Mr. Easton, you don't have to
19 get up.

20 MR. BITGOOD: Okay, the order was if the
21 Court grants our relief today then the only thing left to do
22 would be to Move to Damages. So we have a November 10th at
23 1:30 in the afternoon, if we don't settle at mediation.
24 Mr. Oubre and I have agreed to voluntarily go to mediation
25 October the 4th.

1 MR. OUBRE: Well, Your Honor, I've got an
2 adjuster who is out on leave and as soon as he gets back I
3 will be able to confirm mediation dates. So it might not be
4 on the 4th but I am hoping to get it settled sometime in
5 October.

6 THE COURT: Okay. So we don't have a trial
7 date?

8 MR. OUBRE: No.

9 MR. BITGOOD: No.

10 THE COURT: Okay.

11 MR. OUBRE: And, Your Honor, for the Docket
12 Control Order do we submit an agreed DCO or do you just pick
13 a trial --

14 THE COURT: I would love for you to submit an
15 Agreed Docket Control Order. If you don't have an Agreed --
16 both sides can submit one and I will make a decision.

17 MR. OUBRE: Okay.

18 THE COURT: Okay.

19 MS. NORMAN: Your Honor, I am here on be -- I
20 am Susan Norman.

21 THE COURT: Okay.

22 MS. NORMAN: And I am here on behalf of
23 Dickie Richard P. Jones and Lewis Brisbois Bisgaard & Smith
24 LLP, The Domestic Texas Partnership, who is the Plaintiff in
25 this case.

1 THE COURT: And you are representing who
2 again? Can you say it again, Ms. Norman?

3 MS. NORMAN: I'm sorry, Your Honor, what?

4 THE COURT: Who are you representing?

5 MS. NORMAN: I represent Richard P. Jones and
6 Lewis Bisgaard -- Lewis Brisbois Bisgaard & Smith, The Texas
7 -- Texas Domestic LLP, Limited Liability Partnership, who is
8 the Plaintiff in this case.

9 THE COURT: Okay.

10 MS. NORMAN: And, Your Honor, one more thing.
11 I have litigated with Mr. Easton for 18 years and during
12 that time -- in front of the Judge's with whom we have
13 litigated for -- our respective parties and I have found
14 that many times we are making the same argument and using
15 the same exhibits. And under Fibreboard v. Pool, attorneys
16 are encouraged to adopt other correct arguments and exhibits
17 and I would like the Court's permission today to -- if that
18 is the case with Mr. Bitgood -- to adopt his arguments if
19 those come up as the same as mine.

20 THE COURT: No objections?

21 MS. NORMAN: Thank you, Your Honor.

22 MR. OUBRE: No.

23 THE COURT: Okay, we are going to proceed.

24 The Court calls cause number 22-CCV-070378;
25 Richard P. Jones, Michael Joseph Bitgood AKA Michael Easton

1 and Lewis Brisois Bisgaard & Smith LLP vs. Karina Martinez,
2 Marianna Sullivan, Imperial Lofts LLC.

3 And as I stated earlier, we are going to
4 start with the Rule 12.

5 MR. OUBRE: Your Honor, do you prefer if we
6 stand or sit?

7 THE COURT: That is totally up to you. I am
8 aware of Mr. Easton's situations so I prefer he doesn't --
9 have to -- he doesn't stand. I prefer he doesn't stand.

10 MR. BITGOOD: Every so often I can.

11 THE COURT: Okay, well I'd prefer it if you
12 don't.

13 MR. BITGOOD: Okay, well your preference is
14 my selection.

15 THE COURT: So I am not going to make
16 everybody -- anybody else stand but if you would like to
17 stand that is fine as well, okay.

18 MS. NORMAN: Your Honor, we are also here --
19 the total list of Defendant's in this case is: Imperial
20 lofts LLC, Imperial Lofts Owner, David Oubre, Karina
21 Martinez --

22 THE COURT: That -- we are not there yet, Ms.
23 Norman. When we get there I will let you know. Because
24 they are not necessarily Defendant's until we rule on that.

25 THE REPORTER: Judge.

1 MR. BITGOOD: Your Honor, I miss what you
2 said.

3 THE REPORTER: I need a couple of minutes to
4 restart my computer.

5 THE COURT: Go ahead.

6 (BREAK TAKEN)

7 THE COURT: Okay. Ms. Norman, what I was
8 stating earlier is that I have several motions that were
9 filed this morning regarding, this morning or last night,
10 regarding whether to strike Mr. Oubre and someone else --
11 which I haven't had a chance to read -- as far as parties to
12 this suit. This was filed yesterday.

13 MR. BITGOOD: Your Honor, we are not aware of
14 any Motion to Strike --

15 MS. NORMAN: We haven't seen --

16 MR. BITGOOD: -- we haven't received a copy
17 of it. We don't know what you --

18 THE COURT: Okay. Well, maybe -- I mean, can
19 somebody take this up? I just got this today.

20 (Bailiff complies)

21 MR. BITGOOD: Okay. We know about this. We
22 know about this exhibit. We know about this.

23 MR. OUBRE: Oh, Your Honor, those --

24 MR. BITGOOD: There is not a motion, Judge.

25 MR. OUBRE: -- are supplements that were

1 filed last week.

2 THE COURT: Okay, so they are supplements --

3 MR. OUBRE: I think we sent -- both parties
4 sent copies in for the Court in case the documents didn't
5 hit the system.

6 MR. BITGOOD: Yeah, we are good.

7 THE COURT: Okay.

8 MR. BITGOOD: None of them are requesting a
9 strike, that is what scared me.

10 THE COURT: Okay. I just got all that --

11 MR. BITGOOD: Understood. And again, Your
12 Honor, I can remain seated when I address the Court.

13 THE COURT: You can remain seated when you
14 address the Court.

15 MR. BITGOOD: Thank you. What concerned me
16 is you said a Motion to Strike there is no Motion to Strike
17 here. Ah! There is, it is buried in there.

18 THE COURT: Yes.

19 MR. BITGOOD: Got it.

20 THE COURT: So you guys are saying that, that
21 is a previous motion?

22 MR. BITGOOD: Excuse me, Your Honor?

23 THE COURT: You guys are saying that these
24 new motions that I received this morning are --

25 MR. BITGOOD: Yes, we have copies of them.

1 THE COURT: -- a part of the previous motions
2 that have already been filed?

3 MR. BITGOOD: He claims --

4 MR. OUBRE: Yeah, Your Honor, those are
5 supplements to the previous responses.

6 THE COURT: Okay. So I don't need to
7 consider anything that is in these motions that have been
8 filed yesterday?

9 MR. OUBRE: No, Your Honor. Those are --
10 those are supplements. Both of the parties sent in
11 supplements and responses and they were emailed to the clerk
12 just so that Your Honor would have them because we weren't
13 sure if it would get through the electronic system in time.

14 MR. BEERS: If I can add to that, Judge?

15 THE COURT: Yes.

16 MR. BEERS: Two of the items in that packet
17 that you have were filed yesterday. One of them is in
18 Exhibit 2A that I filed, which is an updated attorneys fee
19 affidavit updated from two weeks ago when we were here. And
20 then, one of the things is a proposed order on the SLAPP
21 Motion that was updated from the one that I filed two weeks
22 ago. So there are two things in there that were actually
23 filed yesterday. I don't know if they have been accepted
24 yet or not but they were filed yesterday.

25 THE COURT: They were accepted this morning.

1 MR. BITGOOD: Your Honor, if I may point out
2 one thing in that Prayer for Relief, he is not asking for
3 the relief of striking the pleading. So you can call it
4 anything you want at the State Bar v Heard, you can call it
5 a deed of trust, it is what you ask for in your Prayer for
6 Relief that controls and puts me on notice as to what you
7 really want. If you look at the Prayer for Relief nowhere
8 does he ask for the Court to strike the pleading. What he
9 asks is that he not be disqualified and disqualification is
10 not on the table today. You asked him last time, do you
11 know what a Rule 12 is and he said he did. That is what we
12 are going on first as per the Court's instructions.

13 THE COURT: That is why I wanted to make sure
14 that we are all on the same page. And that is why --

15 MR. BITGOOD: We are now.

16 THE COURT: Are we going to -- everybody has
17 to understand where I am coming from.

18 MR. OUBRE: And so, there is no argument that
19 we should be disqualified today it is simply under Rule 12,
20 Motion to Show Authority.

21 MR. BITGOOD: That --

22 THE COURT: That is my understanding that's
23 what I thought we were going on today.

24 MR. BITGOOD: That is correct.

25 THE COURT: When I spoke earlier I was saying

1 -- that was what I was talking about when I was telling you
2 you are not there yet. I have not read your supplement at
3 all, okay, because I just received them about ten minutes
4 before we started Court.

5 MR. BITGOOD: Your Honor, you are correct.

6 Disqualification and Rule 12 are two
7 different sets of animals. They both have different
8 remedies so disqualification is not set today. But because
9 of the allegations made in those pleadings -- which are live
10 pleadings -- they will be relevant to everything that takes
11 place today. So those are called judicial admissions. But
12 no, disqualification is not on the table. The only thing
13 set today according to the docket is the Rule 12 Motion, the
14 SLAPP Motion and then his Motions if he survives 12 and the
15 SLAPP. So on that, we all agree.

16 THE COURT: Okay. We will hear 12 -- in this
17 order: Rule 12, Motion to Compel and then we will hear the
18 SLAPP Motion.

19 MR. BEERS: I think the SLAPP would follow
20 the Rule 12 if we are still going after that, Judge.

21 THE COURT: Okay, we can do that.

22 MR. BEERS: I am not going to arm wrestle you
23 but that is what I believe, Judge.

24 THE COURT: Okay. Let's start with the Rule
25 12.

1 Mr. Oubre, you may proceed.

2 MR. BITGOOD: Excuse me, it is my motion but
3 I need to make an announcement.

4 Your Honor, the 682 rules in the Texas Rules
5 of Civil Procedure -- you pegged it correctly, there is only
6 one that shifts the burden. It is Rule 12.

7 The burden is on you, David.

8 MR. OUBRE: Okay.

9 Your Honor, the Plaintiff's have alleged that
10 we do not have authority to represent our clients. I have
11 attached the affidavits from all of my clients indicating
12 that I and the law firm of Lewis Brisbois Bisgaard & Smith
13 have authority to represent them in this case. I have
14 attached the affidavit from Thomas Larson, who is General
15 Counsel for NRES Holdings, his job duty includes the
16 management of legal matters for Imperial Lofts including
17 retention of Counsel's and he indicates that I have
18 authority to represent Imperial Lofts. I filed an
19 additional affidavit from Mr. Larson indicating -- even
20 though it wasn't alleged in the motion that the additional
21 Defendant who was added -- that I have the authority to
22 represent that Defendant which was Imperial Lofts Owner,
23 LLC. I have also attached the affidavits from Ms. Sullivan
24 -- Ms. Sullivan and Karina Martinez which indicate that I
25 have the authority to represent them in this lawsuit.

1 THE COURT: Mr. Easton, your response?

2 MR. BITGOOD: Response? Your Honor, I have
3 one question. Does he rest on his presentation?

4 THE COURT: I --

5 MR. OUBRE: Yes.

6 MR. BITGOOD: He rests. Okay, he said yes.

7 Judge, first of all, the affidavits are not
8 before the Court because they have not been adopted and
9 incorporated by reference. Take the case up to him, Susan.

10 MS. NORMAN: May I approach?

11 MR. BITGOOD: He has to do that. It is
12 fundamental, without that you can't even look at those
13 affidavits. Number two, the affidavits are hearsay. And
14 number three, the case law is legent. He's got to put on
15 evidence before he rests. Do you want the cases? I got
16 them here for you.

17 MR. OUBRE: Your Honor, in response to that
18 --

19 MR. BITGOOD: No, you rested.

20 MR. OUBRE: Well --

21 THE COURT: You can respond to that part of
22 it.

23 MR. BITGOOD: Okay.

24 MR. OUBRE: Your Honor, in the Second Amended
25 Response to Plaintiff's Motion to Show Authority filed

1 7/21/2022 it says, "See Exhibits A-C, incorporated herein
2 and Lewis Brisbois and Exhibits D-F, incorporated herein and
3 attached." Those -- so those are showing that, that is
4 incorporated. So I don't know what he is talking about when
5 he says, "See Exhibits A-C, incorporated herein and
6 attached."

7 MR. BITGOOD: I'm -- may I respond?

8 THE COURT: You may respond, Mr. Easton.

9 MR. BITGOOD: On September 7th, which was the
10 last live pleading, he submitted 6 affidavits -- or he
11 thought he was submitting 6 affidavits -- none them are
12 incorporated by reference into his live pleading.
13 Therefore, they are not even before the Court. So the Court
14 can't even look at them for examination or sufficiency --
15 that preserves our objection. But all of that --
16 notwithstanding, he made a stipulation that he was not going
17 to bring his clients to court. When he made that
18 stipulation I prepared, according to the Bear Opinion and
19 also Phillips v Phillips -- he has to put on evidence, live
20 testimonial evidence. He has already stipulated he is not
21 going to do that. This part of it is over.

22 MS. NORMAN: May I further --

23 MR. BITGOOD: And he rested.

24 MS. NORMAN: May I further respond, Your
25 Honor?

1 Under Harrison v Baer an Amended Pleading
2 completely supplants a prior pleading. So his Amended --
3 Second Amended has been supplanted by his Third Amended,
4 which does not contain attachment and incorporation.

5 MR. OUBRE: Your Honor, in the Second Amended
6 Response to the Motion to Show Authority I attached
7 affidavits from my clients indicating that I have authority
8 to represent them in this matter. The supplements that they
9 are talking about -- there was a Second Supplemental
10 Response and the affidavits were attached to the
11 Supplemental Response and filed with the Court. Several of
12 them are the same affidavits that were previously filed but
13 I did not file an Amended Response. It says, "Second
14 Supplemental Response to Plaintiff's Motion to Show
15 Authority." It is not an Amended Response.

16 MR. BITGOOD: But, Your Honor, in any event
17 his failure to put on evidence -- live testimonial evidence
18 is fatal. I cite the case in Re B-A-A-R.

19 MS. NORMAN: B-E-A-R.

20 MR. BITGOOD: It is part of the Lexis 5889.

21 Did you take him the case law?

22 MS. NORMAN: No.

23 MR. BITGOOD: And this was the key holding in
24 that case. It said he -- there was no testimony. The
25 record shows Turner's statements were not evidence, no

1 witnesses were called and no offer of proof was made,
2 because he failed to carry his burden, the Court had no
3 discretion and had to sustain the Rule 12 Motion.

4 He rested his case and didn't call any
5 witnesses, there is no getting around that.

6 MR. OUBRE: Your Honor, I might add that this
7 Supplemental Response -- not Amended Response but the Second
8 Supplemental Response -- says Defendant's have attached the
9 affidavits of Karina Martinez, Marianna Sullivan and Tom
10 Larson as Exhibits A, B, C and D. These affidavits have
11 already been attached on several pleadings in a Response
12 that was filed -- an Amended Response that was filed -- a
13 Supplemental Response that was filed and they are before the
14 Court. He is asking the Court to ignore affidavits which
15 are testimony and which are evidence that I have authority
16 to represent my clients in this matter.

17 MR. BITGOOD: Your Honor.

18 MR. OUBRE: And I can read the testimony.
19 The affidavits --

20 MR. BITGOOD: No.

21 MR. OUBRE: -- of Karina Martinez, they are
22 before the Court. And she -- they indicate that both me and
23 my firm located at 24 Greenway Plaza have authority to
24 represent them in this lawsuit.

25 MR. BITGOOD: Your Honor, I need to object,

1 please. He rested.

2 THE COURT: What is your legal objection, Mr.
3 Bitgood?

4 MR. BITGOOD: Objection, he has rested his
5 case. He cannot produce new evidence. He rested.

6 THE COURT: The objection will be sustained.

7 MR. OUBRE: So, Your Honor, you --

8 THE COURT: The --

9 MS. NORMAN: Your Honor, may I ask the deputy
10 to hand you this?

11 THE COURT: Okay. Do either parties have the
12 San Antonio v. Aguilar case?

13 MR. BITGOOD: Which case?

14 THE COURT: San Antonio v. Aguilar.

15 (No response)

16 THE COURT: Okay. Neither party has it,
17 right? You don't have it either?

18 MS. NORMAN: No, sir.

19 THE COURT: Okay, give me -- let me take a 5
20 minute break.

21 (Break taken)

22 THE COURT: Let's go back on the record.

23 Mr. Easton, you may proceed.

24 MR. BITGOOD: Under the case -- I knew I had
25 him back on March 11th, like I told him, under the case of

1 In re Salazar cited at 315 S.W.2d 279; when he represents a
2 corporation, Your Honor, he could only represent the
3 corporation. He can't represent any officers, he cannot
4 represent any employees, he cannot represent anybody else.
5 That is Texas law. While he might've gotten away today,
6 okay, with representing the LLC's he cannot represent
7 individuals. He just can't. That is the law in Texas. So
8 I told him I had him then on March the 11th.

9 And the third thing I had him on is that he
10 didn't have a certificate to do business in Texas on March
11 the 11th. When he filed his original pleading their
12 certificate to do business was expired, failing to renew it
13 and filing a pleading makes the pleading void. And on top
14 of that, it also constitutes a misdemeanor. I don't want to
15 accuse my friend of a crime, but inadvertently he may have
16 committed it and you can't be party to that. Under 71.012
17 of the Texas Business and Commerce Code; he must, must -- he
18 is a foreign corporation -- with no grace period have a
19 certificate on file with the Secretary of State before he
20 files a document in a Texas court. He did not do that. He
21 did not even apply until March the 28th. Therefore, every
22 pleading he filed is Void Initio on top of the fact that he
23 cannot represent individuals if he represents the
24 corporation. Would the Court like a copy of the Salazar
25 case?

1 THE COURT: Yes, please.

2 MR. BITGOOD: Susan.

3 THE COURT: Sir, you may respond.

4 MR. OUBRE: Your Honor, we filed the
5 application on March 28th -- that was accepted by the
6 Secretary of State -- that doesn't disqualify us as
7 attorneys from representing a party and filing an answer.
8 Second, we have filed Amended Answers and so it is just a
9 Moot point.

10 THE COURT: You filed an Answer as a
11 corporation, as a firm or as an individual?

12 MR. OUBRE: I filed it as David Oubre under
13 law firm of Lewis Brisbois Bisgaard Smith.

14 MR. BITGOOD: In answer to the Courts
15 question, Your Honor, on March 11th the block said Lewis
16 Brisbois Bisgaard, LLP by David Oubre. So no, he filed it
17 in the name of that firm and they did not have authority to
18 appear in a Texas court.

19 MR. OUBRE: Your Honor, I have authority as
20 an attorney licensed in the state of Texas to appear in the
21 Texas court.

22 MR. BITGOOD: Understood.

23 MR. OUBRE: There are things that a
24 partnership or a corporation can or cannot do or may be
25 fined for doing but that has no bearing on an Answer filed

1 by an attorney who has filed Amended Answers on behalf of
2 all the Defendant's.

3 MR. BITGOOD: There you go, he just said it.

4 Now --

5 MR. OUBRE: I represent both Imperial
6 entities, Karina and --

7 THE COURT: Let him finish. Then, you can
8 respond.

9 MR. OUBRE: Okay.

10 THE COURT: Go ahead.

11 MR. BITGOOD: Me?

12 MR. OUBRE: I -- well, I have filed Amended
13 Answers on behalf of the two Imperial Loft entities, Ms.
14 Sullivan and Ms. Martinez. But regardless, there is no
15 exclusion of an Answer or me not being able to represent
16 parties as a licensed attorney in the state of Texas.
17 Subsequently, we did file the application which was accepted
18 by the Secretary of State.

19 THE COURT: Mr. Bitgood, you can respond.

20 MR. BITGOOD: Thank you, Your Honor.

21 I don't disagree that a lawyer has authority
22 to represent clients in a Texas court but if a lawyer signs
23 a pleading on behalf of a company that cannot appear in a
24 Texas court -- just like a tax franchise and
25 franchisement -- the pleading is void, 71.012 of the Texas

1 Business and Commerce Code is clear. In addition, under
2 Texas Rule of Discipline for Lawyers 109; a lawyer employed
3 by an organization represents the entity and the entity
4 only. He cannot represent Karina Martinez, who is adverse
5 to him now, Mariana Sullivan and the corporations. He can't
6 do that, Texas law forbids it. So I had him there too.

7 I just don't want you to go pull a case and
8 then you say, you pulled the rabbits out of your hat and
9 made me go through all that work -- either way he is out.
10 And 1.12 is organization of a client he signed on and that
11 is, you know -- early on, Your Honor, I had asked him to
12 please furnish me with his contract of employment and he
13 won't do it. Neither will he furnish me with the
14 declaration page from his insurance policy, which the Texas
15 Supreme Court says he should have done that six months ago.
16 He said it in front of me the other day he was going to do
17 it, he is yet to keep his word there. But more importantly
18 than all of that, I bet you if the Court was to Compel the
19 Contract what the contract would show -- it would show they
20 hired Lewis Brisbois Bisgaard & Smith, LLP, not him.

21 Now, if you want to settle the issue once and
22 for all, have the Court order and compel him to produce his
23 contract In Camera for the Court and I'm telling you, that
24 is what it is going to say. Because this is an insurance
25 company and when it comes to insurance companies I am

1 well-versed. The first letter I sent him cited a case
2 called Tilley v. Employers Insurance it is a 1963 case and
3 the Texas Supreme Court -- '73 case, I'm sorry -- set down
4 the standard by which when an insurance company hires a law
5 firm the client remains the only client, they can have
6 nobody else. I know that law. I sent them a letter dated
7 March 14th -- Counsel, watch where you are walking, you are
8 walking into a bad position here but it kept on and on and
9 on -- oh, I don't know what you are talking about, I don't
10 know what you are trying to do -- okay, it is not my job to
11 do his job. Remember, I am the one without the law bar
12 card. He is the one with the bar card, been doing it for 29
13 years. The fact that he didn't take me serious now comes
14 home to roost. But he cannot do that because the law cannot
15 allow him and the Court's cannot allow a lawyer to dip below
16 a standard. The disciplinary rules are mandatory on all of
17 us and he can't -- the Court can't allow that, besides the
18 fact that he rested his case.

19 MR. OUBRE: Your Honor, I have affidavits
20 which have been filed with the Court incorporated into --

21 MR. BITGOOD: Here we go.

22 MR. OUBRE: -- supplements several times.
23 Saying from each individual and a representative of the
24 corporations that I have the authority to represent them in
25 this case.

1 MS. NORMAN: Your Honor, I have to make a
2 hearsay objection. The affidavits are hearsay. He cannot
3 sponsor someone else's words -- even though they may be
4 filed in Court -- if the person is not here to sponsor their
5 own affidavit. If he had his own affidavit, for some
6 reason, he might be able to sponsor it but it is hearsay and
7 I object under hearsay on behalf of Mr. Jones and my other
8 -- the Texas Domestic Partnership, to a hearsay being --
9 attempting to be used as evidence in this case.

10 THE COURT: My issue is -- before I rule on
11 your objection -- is that you rested and that is the only
12 issue I am having.

13 MR. OUBRE: Well, Your Honor, my response
14 with the evidence was already before the Court.

15 THE COURT: No, it was not. You never asked
16 me to take judicial notice. You never asked me to do any of
17 that.

18 MR. OUBRE: Your Honor, I filed a response
19 with the Court incorporating the affidavits and attaching
20 them.

21 THE COURT: And I am sure Mr. Easton is going
22 to say he objects to the affidavits.

23 MR. BITGOOD: If I may, Your Honor? I think
24 we finally found what you have been looking for.

25 American Fire and Insurance Company v. Jones

1 reported at 828 S.W.2d 767 -- we are about to hand you up
2 the case. To answer what he just told you, instruments
3 attached to pleadings are not evidence. Unless, they have
4 been formally introduced, marked and admitted -- give him
5 the case. Judge, wait till we give you the case before you
6 run out.

7 (Bailiff complies)

8 MR. BITGOOD: American Fire, that would be
9 number one of the new table. Number one, American Fire and
10 Insurance Company v. Jones. He can attach everything he
11 wants but it is not evidence of anything. If that was the
12 case the Court would never have to conduct a trial it could
13 just look at the pleadings.

14 THE COURT: I am aware of that.

15 MR. BITGOOD: Thank you, sir.

16 THE COURT: Let's take a 2 minute break.

17 (Break taken)

18 THE COURT: We are back on the record.

19 What I would like both parties to do just so
20 that I can have a clear record, I am going to allow you to
21 make your statement again. Although, you did rest I want
22 you to make your statement clear for the record. And Mr.
23 Easton, you can make your argument clear for the record as
24 well. Both parties. And I want you to -- when you make
25 your argument about the Rule 12 I want you to make your

1 arguments about as far as he -- Mr. Oubre, correct -- has
2 authority to represent them based on the affidavits. I also
3 want you to touch base on the Secretary of State, as well as
4 when that was filed.

5 MR. BITGOOD: With that being said, Your
6 Honor, we can take care of a few housekeeping matters now,
7 that he didn't do and I will do it for him.

8 I'd ask the Court to take judicial notice of
9 certain things. Would the Court do so providing they are
10 within the law?

11 THE COURT: Yes.

12 MR. BITGOOD: I will ask the Court to take
13 judicial notice of the court's file at this time.

14 THE COURT: I take judicial notice of the
15 court's file.

16 MR. BITGOOD: I'd ask the Court to take
17 judicial notice of Chapter 27 of The Civil Practice and
18 Remedies Code.

19 THE COURT: So noted.

20 MR. BITGOOD: I would ask the Court to take
21 judicial notice of the Texas Penal Code 42.07, which is the
22 law.

23 THE COURT: So noted.

24 MR. BITGOOD: Texas Penal Code 37.10. Texas
25 Business and Commerce Code, Section 71.202. Yes? Wait a

1 minute, I have to hand you a copy of it. Susan, take this
2 up there.

3 (Complies)

4 THE COURT: So noted.

5 MR. BITGOOD: My apologies, Judge. There it
6 is in writing, exactly what you are looking at. I gave a
7 copy to opposing Counsel.

8 Texas Business and Commerce Code Section
9 71.203.

10 THE COURT: So noted.

11 MR. BITGOOD: Texas Penal Code 37.02.

12 THE COURT: So noted.

13 MR. BITGOOD: Texas Penal Code 36.08.

14 THE COURT: So noted.

15 MR. BITGOOD: Texas Penal Code 15.02.

16 THE COURT: So noted.

17 MR. BITGOOD: Texas Penal Code 39.03.

18 THE COURT: So noted.

19 MR. BITGOOD: Texas Penal Code 39.06.

20 THE COURT: So noted.

21 MR. BITGOOD: The Texas State Bar Rules of
22 Professional Conduct.

23 THE COURT: That is noted as well.

24 MR. BITGOOD: Rule 13 of the Texas Rules of
25 Civil Procedure.

1 THE COURT: So noted.

2 MR. BITGOOD: Chapter 10 of the Texas Civil
3 Practice and Remedies Code.

4 THE COURT: So noted.

5 MR. BITGOOD: Chapter 11 of The Texas Civil
6 Practice and Remedies Code.

7 THE COURT: So noted.

8 MR. BITGOOD: The Texas Rules of Evidence.

9 THE COURT: So noted.

10 MR. BITGOOD: 15 United States Code 116, The
11 Cares Act.

12 THE COURT: So noted.

13 MR. BITGOOD: Texas Rule of Civil Procedure
14 11 Agreement in file -- the court's file dated April 26th
15 between the parties.

16 THE COURT: Okay, so noted.

17 MR. BITGOOD: And 21 Texas Penal Code 7.02.
18 Hand him the order, please.

19 THE COURT: Now, going back to what I
20 instructed.

21 Mr. Oubre, regarding the Rule 12 you are
22 stating that the affidavits are sufficient?

23 MR. OUBRE: Yes, Your Honor, and my
24 understanding is the Court -- he asked you to take judicial
25 notice of the court's file and that was accepted. I would

1 note that part of the court's file in the response that I
2 filed to this motion was a Supplemental Response to Motion
3 to Show Authority was Exhibit A, the affidavit of Karina
4 Martinez showing you I have authority -- we have authority
5 to represent her in this suit. Exhibit B, the affidavit
6 from Karina Martinez saying that I have -- David Oubre has
7 the authority to represent her in the lawsuit. Exhibit C,
8 the affidavit of Marianna Sullivan indicating that myself
9 and my law firm have authority to represent her in this case
10 and that we are her attorneys. The affidavit of Thomas
11 Larson who is Outside General Counsel for NRES Holdings,
12 that was attached as Exhibit D. His job duties for an NRES
13 Management includes management of legal matters for Imperial
14 Lofts, LLC --

15 MR. BITGOOD: Your Honor, I object him
16 reading from the affidavit.

17 MR. OUBRE: Imperial Lofts, LLC. That is --

18 MR. BITGOOD: Hold up. Hold up, let him
19 rule.

20 THE COURT: Are you reading from the
21 affidavit?

22 MR. OUBRE: Yes, Your Honor.

23 THE COURT: Okay. That objection will be
24 sustained.

25 MR. OUBRE: The affidavit of Thomas Larson

1 which was part of the court's file, which the Court
2 indicated that judicial notice has been taken is attached as
3 Exhibit D. I have also attached as Exhibit E a certified
4 copy of the application of Lewis Brisbois Bisgaard & Smith
5 dated March 9, 2021. And an application attached as
6 Defendant's Exhibit F dated March 28, 2022 which indicates
7 that it was effective on filing and that is dated March 28,
8 2022.

9 THE COURT: All right. When was the
10 expiration date?

11 MS. NORMAN: March 9th --

12 MR. BITGOOD: March 9, 20 -- I'm sorry.

13 MR. OUBRE: March 9, 2022.

14 And, Your Honor, on March 28th I've already
15 filed -- to that Exhibit, which was attached as Exhibit F.
16 And then, Exhibit G was a Proof of Payment for the
17 Application for Registration.

18 THE COURT: So --

19 MR. OUBRE: I attached as Exhibit H --

20 THE COURT: Mr. Oubre --

21 MR. OUBRE: -- what happened was we filled on
22 March 28, 2022, the Application for Registration for Limited
23 Liability Partnership and Mr. Bitgood filed --

24 THE COURT: Before we get into that, Mr.
25 Oubre, it expired on March the 9th, 2022?

1 MR. OUBRE: Yes.

2 THE COURT: Okay. And you renewed it on
3 March 28th?

4 MR. OUBRE: Yes.

5 THE COURT: Okay.

6 MR. OUBRE: Yes, Your Honor, and I requested
7 the -- Amended Answers were filed on behalf of my clients
8 last week and that is part of the court's file. And I
9 requested -- the Court has taken judicial notice of those
10 Amended Answers, it is my understanding, from him moving for
11 the entire file.

12 THE COURT: Okay. Mr. Easton, you can
13 respond.

14 MR. BITGOOD: I got something easier for --

15 MR. OUBRE: And, Your Honor, I would also
16 like to lodge an objection to the Declaration of Custodian.
17 The Motion to Show Authority, Mr. Bitgood filed --

18 MR. BITGOOD: He rested his case, Your Honor,
19 and now he is object --

20 MR. OUBRE: Your Honor.

21 MR. BITGOOD: Objection, Your Honor, he
22 rested his case.

23 THE COURT: Okay --

24 MR. OUBRE: I am going to object to the
25 affidavit that was attached, the Declaration of Custodian.

1 First of all, I would object to the exhibits attached to
2 Plaintiff's reply to Amended Response to Defendant's Motion
3 to Show Authority. There is a Declaration of Custodian
4 filed by Mr. Bitgood AKA Michael Easton. It is not
5 notarized at all.

6 There are several documents which I would
7 object to -- attached to Exhibit A, the Declaration of
8 Custodian. In that Declaration, he refers to Exhibit A;
9 applications before Liability Partnership Correspondence and
10 there are screenshots from websites. I would object to all
11 of those exhibits as -- under Exhibit A, as hearsay. There
12 is no affidavit proving those up. There is no affidavit
13 from anyone. It is simply Mr. Bitgood having an unsworn
14 Declaration and indicating that these are correct copies
15 maintained by the Secretary of State when he is obviously
16 not the custodian of Secretary of State. They are not
17 certified.

18 THE COURT: Okay. I understand that, Mr.
19 Oubre. Let me just ask you a question. Do you want me to
20 take judicial notice of the court's file or do you not?

21 MR. OUBRE: I do want you to take judicial
22 notice of the court's file but I do have an objection to
23 that exhibit.

24 THE COURT: Well, if you -- did you raise
25 that objection when you agreed to the judicial notice of the

1 court's file? Because if you don't want me to take judicial
2 notice of the court's file then your affidavits they don't
3 come in. Do you understand that?

4 MR. OUBRE: Your Honor, I am asking the Court
5 to take judicial notice of the court's file. I am saying I
6 just have an objection to the evidence that was submitted.

7 THE COURT: The Court has already taken
8 judicial notice of the court's file. What I am telling you
9 is that, what would have been proper, is in the beginning
10 when you made your arguments you would have said, can the
11 Court take judicial notice of the court's file. And then, I
12 would have had to -- I would have taken judicial notice of
13 the court's file based on his objection or another objection
14 or not, right. I think now what you are asking me to do is
15 to just take judicial notice of certain parts of the court's
16 file.

17 MR. OUBRE: Your Honor, I am asking the Court
18 to take judicial notice of the court's file including the
19 Amended Answer that I have on file, which is before the
20 Court.

21 THE COURT: Okay.

22 MR. OUBRE: I am just saying, I have a
23 hearsay objection to this Declaration of Custodian and the
24 exhibits that were attached. It is hearsay, it is not even
25 an affidavit.

1 MR. BITGOOD: Your Honor, you had it correct.
2 The time for him to have requested it, before I requested
3 it, was before he rested. That was crucial to his case.
4 Now, I hope the Court doesn't think my old age I going to
5 cut my throat by asking you to take judicial notice of
6 something that is going to kill me. So the case is called
7 Tschirhart v. Tschirhart 876 -- it is number 42 Susan -- 876
8 S.W.2nd 507. And the case holds, the Court may take
9 judicial notice of a pleading in the court's file but it can
10 never take judicial notice of the truth of the matter
11 asserting. And that is exactly what he is asking you to do,
12 he can't do it.

13 MR. OUBRE: Your Honor, is my objection
14 sustained or overruled?

15 THE COURT: As far as --

16 MR. OUBRE: His Declaration of Custodian,
17 attached as Exhibit A to his Plaintiff's --

18 MR. BITGOOD: Should have put it in writing.

19 MR. OUBRE: -- reply to the Amended, Amended
20 Response to Defendant's Motion to Show Authority.

21 THE COURT: Okay, your response to that?
22 Just -- he is objecting to just one part of the Declaration,
23 I guess the Declaration. Correct?

24 MR. OUBRE: Yes.

25 MR. BITGOOD: Your Honor.

1 MR. BEERS: Judge, I guess -- I don't want to
2 get -- I know I am next on the SLAPP Motion but I don't want
3 this record to look like it is confused or muddled as to the
4 distinction between the Court taking judicial notice of some
5 piece of paper being in the file, as opposed to that piece
6 of a paper being evidence in a hearing. Mr. Oubre rested
7 and now he is making objections to things.

8 When my SLAPP Motion is heard there is an
9 affidavit attached to my SLAPP -- Declaration attached to my
10 SLAPP Motion but SLAPP Motions are to be determined. Like
11 Motions for Summary Judgment, where you file an affidavit or
12 things attached to the motion -- which is very distinctive
13 from a Rule 12 Motion, that requires the Court to receive
14 evidence. Somebody puts an exhibit sticker on something and
15 gives it to the Court, somebody gets on the witness stand or
16 raises their right hand and swears to tell the truth.

17 So I don't want this record to look like oh,
18 wait, we were equating taking judicial notice as being
19 evidence in a hearing versus a 166a Motion for Summary
20 Judgment type hearing.

21 THE COURT: And I would agree. I guess the
22 problem I am having -- and maybe, Mr. Oubre, you can help me
23 with it. The issue I am having is since we have Covid
24 issues the affidavit has been given a little bit more
25 credibility, okay. But again, you never -- you rested. So

1 technically, those affidavits are not into -- in evidence.
2 So -- but if we allow Mr. Easton, you know, judicial notice
3 then we can let those, you know, affidavits come into
4 evidence, correct?

5 MS. NORMAN: No, sir.

6 MR. BITGOOD: No, sir.

7 THE COURT: No, no. I asked Mr. Oubre.

8 MS. NORMAN: I'm sorry.

9 MR. BITGOOD: We apologize.

10 THE COURT: Okay.

11 MR. BITGOOD: We are going to shut our mouth.

12 THE COURT: I asked Mr. Oubre to respond to
13 this. So they would come in. Correct?

14 MR. OUBRE: Your Honor has already taken
15 judicial notice. I filed a response to this motion and
16 attached as evidence affidavits from my clients.

17 THE COURT: But --

18 MR. OUBRE: That is evidence in my authority.

19 THE COURT: So what you are saying is that
20 anything that I take judicial notice of is considered
21 evidence?

22 MR. OUBRE: I -- Your Honor, I am saying that
23 I have filed a response.

24 THE COURT: That is not what I asked you, Mr.
25 Oubre.

1 MR. OUBRE: Your Honor, you are taking
2 judicial notice of the entire file. I am just saying I have
3 an objection to this portion of the motion.

4 THE COURT: I'm not even talking about the
5 motion right now. What I am saying to you is that when I
6 take judicial notice are you saying to the Court that, that
7 is evidence? That everything that I take judicial notice of
8 is considered evidence?

9 MR. OUBRE: Yes.

10 MS. NORMAN: May I approach?

11 THE COURT: You may respond now.

12 MR. BITGOOD: To your what? Question?

13 THE COURT: You may respond.

14 MR. BITGOOD: Your Honor, Tschirhart says if
15 it was evidence we would never need a trial, we would never
16 have to come down here, we would never need to impanel
17 jurors because you can just take judicial notice and pick
18 what side you like the most and render a judgment. It is
19 never evidence. He has to put on evidence. He had his
20 opportunity. He rested without putting on evidence. Now, I
21 can help him out for November the 10th if you let me -- if
22 you let me.

23 THE COURT: Okay. Go ahead, you may proceed.

24 MR. BITGOOD: Yes, Your Honor. I would like
25 to be sworn first, please, from where I sit.

1 THE COURT: Will you please raise your right
2 hand? Do you solemnly swear or affirm the testimony you are
3 about to give will be the truth, the whole truth and nothing
4 but the truth so help you God?

5 MR. BITGOOD: I do.

6 Your Honor, I am going to offer BE1 through
7 16 as evidence -- and that is the list. I am handing
8 Counsel a copy of that list and that is for the court
9 reporter and I move to admit BE1 through 16 into evidence
10 for the purpose of this hearing and any subsequent hearing.
11 BE, Your Honor, stands for Bitgood Easton just so that there
12 is no confusion.

13 THE COURT: Before I -- I am going to ask for
14 any objection but before I rule I want to finish the Rule
15 12.

16 MR. BITGOOD: That will -- okay, but I still
17 offer them.

18 THE COURT: Any objection?

19 MR. OUBRE: Yes, Your Honor, I haven't even
20 seen exactly what has been attached.

21 MR. BITGOOD: Hand it to him. Susan, hand it
22 to him.

23 THE COURT: You can get that. I will allow a
24 few more minutes until Mr. Oubre sees them but let's take up
25 the Rule 12 before I make my decision.

1 Mr. Oubre, let me ask you a question
2 regarding the Rule 12. Do you have witnesses that you can
3 get here?

4 MR. OUBRE: Today?

5 THE COURT: Yes, today.

6 MR. OUBRE: No.

7 THE COURT: Okay.

8 I am going to grant the Rule 12.

9 MR. BITGOOD: Thank you.

10 MR. OUBRE: And, Your Honor, for the purposes
11 of them drafting the order can I request exactly what the
12 basis --

13 MR. BITGOOD: Hold on. Hold on, give him the
14 order. Wait, wait, wait. He is right. I need to give --
15 show him. And I filled in the date for the next hearing.

16 THE COURT: I am -- let me just say this for
17 your record. I am going to say this for the record so you
18 can have it. Even if I say that you put on evidence with
19 the affidavits, okay, they were never admitted into
20 evidence. Anything he filed from the date that it was
21 expired would be gone anyway. You understand that, right?
22 You know that, because that is why you filed the Answers --
23 the Amended Answer. So I guess that is part of the issue
24 and I will let you have that for the record. Normally, I
25 wouldn't say anything.

1 MR. OUBRE: Your Honor, can I at least
2 request that this case be abated pending appeal of this
3 issue?

4 MR. BITGOOD: I will respond to that.

5 THE COURT: You can.

6 MR. OUBRE: He is not entitled to an
7 interlocutory appeal on this issue, okay. If he wants to
8 abate the case as he told me -- no, I promised not to do
9 that to him. We are not going to push each other about what
10 we spoke on the phone -- this is the law. He wants to go to
11 mediation October 4th. This is why I didn't want to pass
12 this hearing. The gentleman needs some positive
13 reinforcement because every time we've tried to make a deal
14 with him we have been pranked, badly pranked. So I don't
15 want anymore pranks. If he is serious about settling he can
16 show up at that mediation take care of what was mine
17 minimal, minimal -- I mean I was under \$20,000 including
18 attorney fees until they pranked -- and take care of this
19 gentleman back here named Richard P. Jones for what they did
20 to him. And I haven't had a chance to tell this Court
21 exactly what they did to him. But he keeps telling me he
22 doesn't understand this case. This case is really simple.
23 He don't have a defense. They had no standing and they
24 moved to evict 12 black tenants from the apartment complex
25 without standing, and I caught them and they came after me.

1 And while this was going on, this 21 day prank, his client
2 was on the phone trying to get me indicted. Calling the
3 office of the District Attorney alleging, among other
4 things, that there was a conspiracy --

5 (Interruption)

6 MR. BITGOOD: Oh! That is Mr. Healy. Let
7 him in.

8 (Bailiff complies)

9 MR. BITGOOD: -- that there was a conspiracy
10 between John Healy, Brian Middleton and Michael Easton. Not
11 to prosecute Michael Easton.

12 MR. OUBRE: Let --

13 MR. BITGOOD: Let me finish there, Counsel.

14 All these things were going on while we were
15 supposed to be in settlement talks. There was no legitimate
16 settlement. Now, today's ruling puts him behind the 8 ball.
17 He has to go to mediation in good faith. Which is what I am
18 glad we did today. He can settle this. The next set of
19 orders you see -- Motion to Vacate all Previous Orders and
20 Dismiss the Case with Prejudice. It is a win-win for
21 everybody with dignity and with honor. Because I was
22 retired, Judge Lewis, retired. Until this man called me
23 begging me to help him. And I said, I don't have time for
24 this. He said Michael, they are going to nail me. And as I
25 went down that list of tenants I noticed something that was

1 very distinct, they all happened to be one race. And that
2 ain't right, by anybody's stretch of the imagination. And
3 if his client ever went before a jury, ever, I would hate to
4 think what a jury is going to do to his client. So this is
5 in his best interest -- to pay the pennies on the dollars
6 we've asked for and get rid of this case. So I can go back
7 to retirement and running around Houston with my friend,
8 John Healy, trying out different restaurants every week --
9 that is what I really want to be doing. And writing, sir.

10 Now, the Court has made it's ruling and all
11 we ask is that you sign the order. But that is what this
12 case was about, Judge.

13 THE COURT: Mr. Oubre?

14 MR. OUBRE: Well, Your Honor, I object to the
15 order. Striking the pleadings --

16 MS. NORMAN: It is required.

17 MR. OUBRE: -- of the Defendant's in entering
18 the Default --

19 MR. BITGOOD: It has to.

20 THE COURT: The Default part is not -- I
21 haven't seen the order but the Default part -- I have to
22 Strike the Pleadings, okay. That is required.

23 MR. OUBRE: Your Honor, there are Amended
24 Answers on file that --

25 MR. BITGOOD: Makes no --

1 MR. OUBRE: -- are before the Court.

2 MR. BITGOOD: Judge.

3 THE COURT: Hold on.

4 MR. BITGOOD: Okay.

5 THE COURT: I have made my decision, okay.

6 So we can move on.

7 MR. OUBRE: Well, Your Honor, if that is the
8 Courts ruling I can't go forward with any other hearings
9 today.

10 MR. BITGOOD: That is correct.

11 Hand him the order.

12 MR. OUBRE: I object to the entry of the
13 order with regard to Striking the Pleadings and entering a
14 Default Judgment.

15 THE COURT: I am not going to enter a Default
16 Judgment.

17 MR. OUBRE: Okay.

18 MR. BITGOOD: Can you interlineate the word
19 "Default" then?

20 THE COURT: I am not going to enter a Default
21 Judgment. I am going to Strike the Pleadings because I have
22 no choice. It says, "I shall." So I have to Strike the
23 Pleadings but I am not going to enter a Default Judgment.

24 MR. BITGOOD: Your Honor, would you like the
25 case or you have already made your ruling on that?

1 THE COURT: I have already made my ruling.

2 MR. BITGOOD: Thank you, sir.

3 THE COURT: Thank you.

4 MR. BITGOOD: Now, Judge, Mr. Beers motion is
5 what is left and he can't say a word.

6 MR. OUBRE: Your Honor, I'm going to -- can I
7 at least request a continuance of any additional motions?
8 In light of the fact that you have ruled that my clients
9 have lost their lawyers and they -- I think they are
10 entitled to have representation in this case.

11 MR. BITGOOD: There is a school of thought
12 that goes with this, Judge. When you are given a hundred
13 warnings it is not my job nor this poor lady's job or Mr.
14 Jones' job nor mine to do his work. He had enough advance
15 notice. I sent him case sites, if you will look them up.

16 THE COURT: Mr. Oubre is correct. His
17 clients do not have representation at this time. So you are
18 correct in that. So I cannot move forward because they
19 don't have representation.

20 MR. BITGOOD: If that is your feeling --

21 THE COURT: That is the thing about doing the
22 Rule 12 first.

23 MR. BITGOOD: Okay. If the Court will sign
24 the order, interlineate the Default, we will go to
25 mediation. If mediation doesn't settle then we will be

1 back.

2 THE COURT: Then you come back, yes.

3 MR. BITGOOD: November 10th at 1:30 is what
4 the order says.

5 THE COURT: Yes.

6 MR. BITGOOD: Good. Okay, David.

7 THE COURT: We are off the record.

8 *(Whereupon, thereafter the proceedings for the*
9 *above-referenced case this date were concluded.)*

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1 THE STATE OF TEXAS)

2 COUNTY OF FORT BEND)

3 I, ASHLEY AVILA, Official Court Reporter in and
4 and for County Court #3, Fort Bend County, State of
5 Texas, do hereby certify that the above and foregoing
6 contains a true and correct transcription of all
7 portions of evidence and other proceedings requested in
8 writing by counsel for the parties to be included
9 in this volume of the Reporter's Record, in the
10 above-styled and numbered cause, all of which occurred
11 in open Court or video telephonically and were
12 reported by me. I further certify that this Reporter's
13 Record of the proceedings truly and correctly reflect
14 the exhibits, if any, offered by the respective parties.

15 I, further, certify that the total cost for
16 preparation of this Reporter's Record is \$308 and is
17 due and owing by DAVID OUBRE.

18 WITNESS MY OFFICIAL HAND this 13th day of
19 September, 2022.

20 /s/Ashley Avila
21 ASHLEY AVILA, CSR
22 TEXAS CSR # 11807
23 OFFICIAL COURT REPORTER
24 COUNTY COURT OF LAW # 3
25 RICHMOND, TEXAS 77469
PHONE: 281-292-7780

ASHLEY AVILA, CSR #11807
COUNTY COURT AT LAW NO. 3
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